

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA**

ZACHARY CRUZ, MICHEAL DONOVAN,  
and RICHARD MOORE.

Plaintiffs,

v.

DUANNE LEE CHAPMAN, et al.,

Defendants.

Case No.:

DECLARATION OF DEBORAH CRUM



**DECLARATION OF DEBORAH A. CRUM**  
**FEDERAL BUREAU OF INVESTIGATION**

I, Deborah A. Crum, declare as follows:

1. I am employed by the Federal Bureau of Investigation (FBI) as a Supervisory Paralegal Specialist, currently assigned as the Unit Chief of the Discovery Unit (DU), Litigation and Technology Management Section, Litigation Branch, Office of the General Counsel (OGC), located in Washington, D.C. I have been employed by the FBI since April 1990.

2. The statements contained in this declaration are based upon my personal knowledge, review, and consideration of documents available to me in my official capacity, discussions with OGC counsel involved with this matter, and on information obtained from other FBI employees.

3. I submit this declaration in support of Defendants' Motion to Dismiss.

4. I have access to the records contained in the FBI's Central Records System (CRS). I am also personally familiar with the FBI records maintenance and retrieval system.

5. The records in the FBI's CRS include records of administrative claims submitted to the FBI under the Federal Tort Claims Act. All administrative claims submitted to the FBI are indexed into the CRS. Once indexed, a record of an administrative claim is retrievable through a

search of the general indices to the FBI's CRS. In short, the CRS is the FBI's official system of records for all investigative, administrative, and official business of the FBI.

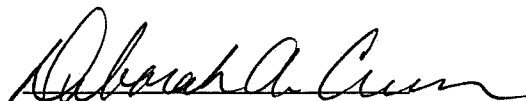
6. CRS enables the FBI to maintain information that it has acquired in the course of fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel, and other files compiled for law enforcement purposes. Searching the FBI's CRS is the means by which the agency can determine what retrievable information, if any, it may have in its files on a particular subject matter or individual.

7. The DU is responsible for locating, reviewing, and processing for release any and all responsive materials which pertain to litigation and administrative matters in which the Bureau is either directly or indirectly involved.

8. As Unit Chief, I oversee the Paralegal Specialists who conducted a diligent search of the general indices to the FBI's CRS on 11/8/2021. This search of the FBI's CRS did not locate any administrative claim submitted by or on behalf of Plaintiffs, Zachary Cruz, Micheal Donovan, and Richard Moore directly to the FBI.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge and belief.

Executed this 8th day of November 2021.



Deborah A. Crum  
Unit Chief, Discovery Unit  
Office of the General Counsel  
Federal Bureau of Investigation  
Washington, D.C.